

REMARKS

The amendments included herein were previously submitted to the U.S. Patent and Trademark Office on October 9, 2003, but were not entered as a result of the application being in abandonment status. The application has since been returned to pending status and the abandonment withdrawn. Because the Amendment of October 9, 2003 was not entered, Applicants believe the claims to be in the condition that they were before the Amendment of October 9, 2003. Therefore, the amendments are resubmitted in the present Amendment.

Claims 1-13 and 15-58 are pending in the application. Independent Claims 1, 28, and 37 have been amended. Support for the amendments can be found in the Specification on at least page 6, line 4 through page 7, line 12, and Fig. 2 as originally filed. Acceptance is respectfully requested.

Examiner Interview

Applicants' Attorney thanks Examiner Colbert for a helpful telephonic interview on October 7, 2003 with the undersigned regarding the pending case. The substance of the interview consisted of the following:

- (1) U.S. Patent No. 5,879,103 to Trede was discussed;
- (2) An agreement with respect to amendments for the independent claims was reached.

Rejections under 35 U.S.C. 103

Claims 1-13 and 15-36 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Nakagawa (U.S. Patent No. 5,819,295) in view of Trede (U.S. Patent No. 5,873,103). Claims 37-58 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Trede in view of Nakagawa.

Pursuant to the telephonic interview of October 7, 2003, independent Claims 1, 28, and 37 have been amended to recite the additional limitations of (1) embedding document contents in the structured workfolder, and (2) a placeholder structurally including a file object hook and a deadline element. Therefore, in accordance with the agreement reached during the interview, Claims 1, 28, and 37 as now claimed are believed to be in condition for allowance.

Furthermore, the claims are believed to be in condition for allowance for the additional reasons discussed below. Before discussing the cited references, however, a brief review of the Applicants' disclosure may be helpful. The Applicants' disclosed invention provides for a structured workfolder for organizing electronic documents in a self-contained data repository. The workfolder comprises sections for grouping related documents, and space-reserving placeholders for indicating documents expected to be placed in the workfolder. In the present invention, a placeholder is defined as a slot that has been reserved for one or more specific documents not yet created or received. When the workfolder is used to organize documents for a given work item, the presence of the placeholder within the workfolder indicates to the user that specific documents are expected to be created and stored there (*See* Specification page 7, lines 4-12 and Figs. 1-2).

Turning to the cited references, Nakagawa discusses a system for storing and managing version information, in folders, of existing files according to classifications. The files are stored in a separate memory from the folders (*See* Nakagawa, col. 2, lines 30-41).

Cited reference Trede discusses a system that provides the capability to move or copy data files from one server to another server. The system utilizes so called placeholder entries on a primary storage device that designate the location of existing files residing on a secondary storage device (*See* Trede, col. 2, lines 27-41; and col. 6, lines 51-60).

To establish a *prima facie* case for obviousness under 35 U.S.C. 103(a), (1) there must be some suggestion or motivation to combine reference teachings, (2) there must be a reasonable expectation of success, and (3) the references when combined must teach or suggest all the claim limitations. For the reasons discussed below, it is respectfully submitted that the Office has not established a *prima facie* case under 35 U.S.C. 103(a) for Claims 1-13 and 15-58, and that therefore, those claims should be found in condition for allowance.

Nakagawa and Trede, either separately or in combination, do not teach or suggest the Applicants' claimed "at least one structured workfolder for storing and organizing electronic documents which said documents may or may not exist at the time of workfolder creation" or "...each placeholder being a respective slot that has been reserved for new documents expected to be added to said workfolder via said placeholder..." as recited in independent Claim 1. The system of Nakagawa stores and manages version information of files that are already in existence (*See* Nakagawa, col. 2, lines 30-41; and col. 7, lines 18-26). The system of Trede utilizes

placeholder entries on a primary storage device that designate the location of files, already in existence, residing on a secondary storage device (*See* Trede, col. 2, lines 27-41; and col. 6, lines 51-60). In contrast, the Applicants' disclosed invention may organize, via the use of placeholders, documents that are not yet in existence at the time of workfolder creation, but that are expected to be added at a later time.

Furthermore, Nakagawa and Trede, either separately or in combination, do not teach or suggest the Applicants' claimed "...deadline element having a triggering condition field for storing a triggering event..." as recited in independent Claim 1. While the system of Nakagawa provides for the clean-up of old file versions in response to a triggering event, the triggering event is not stored as part of a placeholder (*See* Nakagawa, col. 5, lines 32-43). In the Applicants' disclosed invention, a triggering event is stored within a placeholder as part of a deadline element (*See* Specification, page 8, lines 13-15; and page 9, lines 1-12).

Therefore, Nakagawa and Trede, either separately or in combination, do not teach or suggest the Applicants' invention as claimed in independent Claim 1 and for the reasons discussed above, it is believed that independent Claim 1 should be found in condition for allowance.

Independent Claim 28 has similar claim terms as that recited above for Claim 1. Independent Claim 28 was rejected under a similar rational as independent Claim 1 and, therefore, based on the reasoning discussed above for independent Claim 1, independent Claim 28 is believed to be in condition for allowance.

Similar to Claims 1 and 28, Nakagawa and Trede, either separately or in combination, do not teach or suggest the Applicants' claimed "creating at least one placeholder within said workfolder, the placeholder being a slot that has been reserved for new documents which may or may not exist at the time of workfolder creation and are expected to be linked to said workfolder via said placeholder" as recited in independent Claim 37. As discussed above, both Nakagawa and Trede disclose systems for use with files that are already in existence.

Furthermore, for the reasons discussed above for Claims 1 and 28, Nakagawa and Trede, either separately or in combination, do not teach or suggest the Applicants' claimed "...deadline element having a triggering condition field for storing a triggering event..." as recited in independent Claim 37.

Therefore, Nakagawa and Trede, either separately or in combination, do not teach or suggest the Applicants' invention as claimed in independent Claim 37 and for the reasons discussed above, it is believed that independent Claim 37 should be found in condition for allowance.

Dependent Claims 2-13, 15-27, 29-36, and 38-58 are directly or indirectly dependent on independent Claims 1, 28, and 37 and thus are novel over the cited references for the same reasons discussed above for independent Claims 1, 28, and 37.

Therefore, Nakagawa and Trede, separately or in combination, do not teach or suggest the Applicants' claimed invention and, therefore, none of the cited references alone or in combination makes obvious the Applicants' claimed structured workfolder.

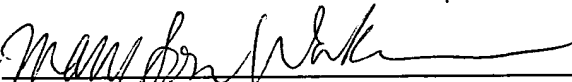
As such the 35 U.S.C. 103(a) rejections of Claims 1-13 and 15-58 are believed to be overcome. Accordingly, the present invention as claimed is not believed to be anticipated or made obvious from the cited references or any prior art. Removal of the rejections under 35 U.S.C. 103(a) and acceptance of Claims 1-13 and 15-58 is respectfully requested.

CONCLUSION

In view of the above amendments and remarks, it is believed that Claims 1-13 and 15-58 are in condition for allowance, and it is respectfully requested that the application be passed to issue. If the Examiner feels that a telephone conference would expedite prosecution of this case, the Examiner is invited to call the undersigned.

Respectfully submitted,

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